#### DORSEY, KING, GRAY, NORMENT & HOPGOOD

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August 11, 2011

VIA FEDEX

RECEIVED

AUG 1 2 2011

Mr. Jeff Derouen Executive Director Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40601 PUBLIC SERVICE COMMISSION

Re: Case No. 2011-00196

Kenergy Corp.

Dear Mr. Derouen:

Enclosed you will find the original and 10 copies of Kenergy's Supplemental Responses to Commission Staff's First Request for Information Dated July 25, 2011.

Your assistance in this matter is appreciated.

Very truly yours,

DORSEY, KING, GRAY, NORMENT & HOPGOOD

By

J. Christopher Hopgood Counsel for Kenergy Corp.

JCH/cds

Encls.

COPY/w/encls: Mr. Sanford Novick, Kenergy

### COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENERGY CORP.

FOR CERTIFICATE OF CONVENIENCE ) CASE NO. 2011-00196
AND NECESSITY )

### SUPPLEMENTAL RESPONSES TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION DATED JULY 25, 2011

DORSEY, KING, GRAY, NORMENT & HOPGOOD 318 Second Street
Henderson, Kentucky 42420
Telephone 270-826-3965
Telefax 270-826-6672
Attorneys for KENERGY CORP.

J. Christopher Hopgood

J. Christopher Hopgood, Counsel for Kenergy Corp.

## KENERGY CORP. RESPONSE TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION

#### CASE NO. 2011-00196

#### **VERIFICATION**

I, <b>STEVE THOMPSON</b> , verify, state and affirm that the data request responses filed with this verification and for which I am listed as a witness are true and correct to the best of my knowledge, information and belief formed after a reasonable inquiry.
Steve Thompson, Vice President - Finance
STATE OF KENTUCKY
COUNTY OF <u>aniesa</u>
The foregoing was signed, acknowledged and sworn to before me by <b>STEVE THOMPSON</b> , this// day of August, 2011.
My commission expires Oct. 16, 2012
Berita M. Martin
Notary Public, State of Kentucky at Large

(seal)

## KENERGY CORP. RESPONSE TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION

#### CASE NO. 2011-00196

#### **VERIFICATION**

I, GERALD FORD, verify, state and affirm that the data request responses filed with this verification and for which I am listed as a witness are true and correct to the best of my knowledge, information and belief formed after a reasonable inquiry.

Gerald Ford, Vice President - Operations

STATE OF KENTUCKY

COUNTY OF: DAVIESS

The foregoing was signed, acknowledged and sworn to before me by **GERALD FORD**, this // day of August, 2011.

My commission expires Upril 24, 2014

Notary Public, State of Kentucky at Large

(seal)

# KENERGY CORP. RESPONSE TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION

#### CASE NO. 2011-00196

#### **VERIFICATION**

I, TIM SKINNER, verify, state and affirm that the data request responses filed with this verification and for which I am listed as a witness are true and correct to the best of my knowledge, information and belief formed after a reasonable inquiry.

Tim Skinner, Architect

STATE OF KENTUCKY

COUNTY OF: HENDERSON

The foregoing was signed, acknowledged and sworn to before me by **TIM SKINNER**, this /// day of August, 2011.

My commission expires <u>September 29, 2013</u>

Notary Public, State of Kentucky at Large

(seal)

#### 1 KENERGY CORP. 2 **RESPONSE TO COMMISSION STAFF'S** 3 FIRST REQUEST FOR INFORMATION 4 5 CASE NO. 2011-00196 6 7 8 Item 4) State whether the estimated cost of the project of 9 \$2,000,000.00 includes all costs of the project, such as, the land, grading and other site preparation, utility installation, paving, fencing, landscaping, 10 security features, lighting, etc. If no, provide a listing of all items not 11 included and the estimated cost of those items. 12 13 **RESPONSE:** 14 The \$2,000,000.00 includes all construction costs associated with 15 the project with the exception of the cost of the land, an oil 16 containment system, communication equipment, engineering 17 and architecture fees. (ex: Grading and other site preparation, 18 utility installation, paving, fencing, landscaping, security 19 features, lighting, etc. are included.) Land costs will be 20 \$50,000.00, an oil containment system is estimated to be \$20,000.00, a communication system is estimated to cost 21 \$39,520.00, engineering fees are estimated to be \$17,770.00, and 22 23 architect fees are \$160,000.00. 24

WITNESS: Tim Skinner and Gerald Ford

25

1 2 3	KENERGY CORP. RESPONSE TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
4 5 6	CASE NO. 2011-00196
7 8	Item 16) Provide the amount of fees paid to date and the amount that will be
9	paid before completion for professional services performed by the architect and
10	engineers.
11	RESPONSE:
12	The table attached to the original Item 16, page 2 of 2, is
13	correct. The additional amount of architect and engineering
14	fees is expected to be \$96,000.00 and \$2,000.00 respectively.
15	Legal fees are estimated to be \$5,800.00.
16	
17	WITNESS: Gerald Ford

1		KENERGY CORP.				
2	RESPONSE TO COMMISSION STAFF'S					
3	FIRST REQUEST FOR INFORMATION					
4						
5		CASE NO. 2011-00196				
6						
7						
8	Item 19)	Provide an analysis of the financial impact to Kenergy as result of				
9	the propose	d Marion branch office project.				
10	RESPONS	<u>E:</u>				
11	See a	attached page 2 of 2.				
12						
13	WITNESS:	Steve Thompson				

### KENERGY CORP. CASE NO. 2011-00196 - 1st DATA REQUEST ITEMS 19 - 21

#### **FINANCIAL IMPACT**

1	Increase	ncrease Utility Plant in Service \$2,287,290						
2	Decrease					\$ 2,287,290		
3		Explanation: Purchase of new Marion opera	ations (	center at pro	jected	cost		
4		utilizing the funds in the RUS Cushion of Cre	edit ac	count.				
5								
6	Decrease	Utility Plant in Service			\$	184,869		
7	Decrease	Accumulated Provision for Depreciation	\$	96,444				
8	Increase	RUS Advance Payments on Debt	\$	88,425				
9		Explanation: Sale of existing Marion operation	ons ce	enter projecte	ed at b	ook		
10		value						
11						New	Old	
13	Increase	Utilities Expense	\$	3,263	(\$	15,500 -	\$12,237)	
14	Increase	Cleaning, Waste Disposal & Other		23,661	(\$	48,000 -	\$24,339)	
15	Increase	Taxes		14,711	(\$	16,240 -	\$ 1,529)	
16	Increase	Insurance		4,565	(\$	5,500 -	\$ 935)	
17	Increase	Depreciation		42,072	(\$	44,746 -	\$ 2,674)	
18	Decrease	Interest Income		109,943	(\$2	2,287,290 -	\$88,425)	x 5%
19	Decrease	Margins	\$	198,215_				
20				······································				
21		Explanation:						
22		Projected increase in expenses or interest in	ncome	due to new	Marior	operation:	s center.	
23		•						
24		RATE IMPACT						
25	The projecte	ed rate impact in the next general rate applicat	ion pro	ceeding (ex	cluding	g power cos	st and	

The projected rate impact in the next general rate application proceeding (excluding power cost and direct serve accounts) forecasted to be filed in 2014 is to change the percent increase from 2.1% to 2.3%.

26

1 2 3	KENERGY CORP. RESPONSE TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION					
4 5 6 7	CASE NO. 2011-00196					
8	Item 20) Refer to pages 5 and 6 of the application, paragraphs (i) and (j).					
9	Kenergy states in paragraph (i) that cash reserves will be used to finance the new					
10	construction. However, paragraph (j) shows an increase in interest expense from					
11	\$4,421 to \$100,000 when comparing expenses from the existing facility to the					
12	proposed facility. Given that Kenergy is not proposing to borrow money for the					
13	new facility, explain the reason for the increase in interest expense.					
14	RESPONSE:					
15	See Item 19, page 2 of 2, line 18. The RUS cushion of credit					
16	account, which earns 5%, will be decreased by \$2,198,865.00.					
17	Therefore, interest income will be decreased by \$109,943.00.					
18						
19	WITNESS: Steve Thompson					

1 2 3	KENERGY CORP. RESPONSE TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION				
4 5	CASE NO. 2011-00196				
6 7					
8	Item 21) Provide an analysis of the rate impact of the proposed Marion branch				
9	office project.				
10	RESPONSE:				
11	Item 21 information in the original application is correct. The				
12	Item 21 data request response should reflect that.				
13					
14	WITNESS: Steve Thompson				